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6 UNITED STATES BANKRUPTCY COURT
7 EASTERN DISTRICT OF CALIFORNIA
8

9 In Re:) **Case Number: 2011-44896**
10 JUAN MANUEL MEDRANO)
HERNANDEZ) **Docket Control No. PR-1**
11)
12) **NOTICE OF MOTION BY DEBTOR**
13) **FOR ORDER OF ABANDONMENT OF**
14) **DEBTOR'S BUSINESS**
15)
16) **Date:** November 15, 2011
Debtor) **Time:** 9:30 a.m.
) **Place:** Dept. C/Courtroom 35
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18 COMES NOW, debtor, JUAN MANUEL MEDRANO HERNANDEZ, who move the
19 above-entitled Court for an Abandonment of Debtor's Business known as La Islita Restaurant.

20 1. JUAN MANUEL MEDRANO HERNANDEZ Ais the debtor in the above-named
Chapter 7 case.

22 2. Debtor is the owner of a business known as La Islita Restaurant, located at 2236
Northgate Blvd., Sacramento, California 95833.

24 3. Debtor, in Schedule B has listed the value of the business at \$15,000.00, the value
of the furniture at \$4,000.00, and the value of the inventory at \$1,000.00; all of which has been

1 claimed exempt in the Debtor's Schedule C.

2 4. Debtor has 1 part-time employee but does not have a lease on the premises.

3 Debtor's business is a Mexican Restaurant.

4 5. As of the date of this Motion, the duly appointed Trustee, John Bell, has not
5 administered such business or the property of such business.

6 6. Debtors assert that the business known as La Islita Restaurant is therefore of
7 inconsequential value to the estate in that there is no equity in such property in excess of the
8 Debtor's exemptions.

9 7. Debtor asserts that the obtaining of an Order of Abandonment is in his best
10 interests as it will allow the debtor to protect the business and the property of the business.

11 WHEREFORE, Debtor request the following relief:

12 1. An Order of Abandonment of Debtor's interest in the business known as
13 La Islita Restaurant;

14 2. Such other and further relief as the Court deems just and proper.

17 Dated: October 25, 2011

18 _____ /s/
PATRICK RIAZI
Attorney for Debtor